

REMARKS

Claims 1-23 and 30-32 are pending and claims 1 and 12 have been amended.

Applicants appreciate the Examiner's indication in the Office Action that claims 8-11 and 20-23 are allowable. Claims 33-37 have been added. An RCE and the appropriate RCE fee are included herewith. In view of the foregoing amendments, as well as the following remarks, Applicants respectfully submits that this application is in complete condition for allowance and requests reconsideration of the application.

Amendments to the Specification

Applicants have amended the specification to remedy typographical and editorial errors. Specifically, the changes made to the paragraph beginning at page 18, line 4 to correct a typographical error ("isotropic" to "anisotropic") are supported at page 7, lines 6-10.

Applicants submit that no "new matter" has been added by these amendments to the specification.

Amendments to the Claims

Applicants have amended claims 1 and 12 to recite the relationship between the surfaces of each guide of the two pluralities of guides to the cross-machine direction and to each other. These amendments are supported by FIGS. 3, 4, and 7-11, and accompanying text.

Rejections of Claims Under 35 U.S.C. § 102

Claims 1-7, 12-19, and 30-32 stand rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,709,623 to Haynes et al. (hereinafter *Haynes*). Claims 1, 12, and 32 are the

independent claims subject to this rejection. The Examiner contends that *Haynes* shows or teaches all the features of the rejected claims. Applicants respectfully traverse the Examiner's contention.

Independent claims 1 and 12, as amended, each set forth two pluralities of aligned guides, with each guide having a surface that is parallel to the cross-machine direction. Surfaces perpendicular to the cross-machine direction extend between the first plurality of guides and the second plurality of guides. The Examiner contends that *Haynes* discloses "the draw unit, which comprises the teeth as first guides and groove (301) as second guides, which are aligned to the support (307) in a first row oriented and second orientation respectively in a cross machine direction."

As shown in Figure 3 of *Haynes*, each of the teeth (303) has an orientation that is rotated relative to the cross-machine direction, which a person having ordinary skill in the art would understand precludes the surfaces of the teeth (303) being parallel to the cross-machine direction. Hence, no surfaces of the teeth (303) in *Haynes* are parallel to a cross-machine direction. Furthermore and as also shown in Figure 3, each of the side surfaces (301) of teeth (303) has an orientation that is significantly rotated relative to the cross-machine direction. To a person having ordinary skill in the art, this precludes the side surfaces (301) from being perpendicular to a cross-machine direction. Hence, no side surfaces (301) in *Haynes* are perpendicular to a cross-machine direction, in contrast to Applicants' amended claims 1 and 12.

If the bolts (305) in *Haynes* were loosened and the teeth (303) were rotated to align the teeth (303) in a first row oriented in the cross-machine direction, there would be no "second

plurality of guides” with a surface parallel to the cross machine direction as required by Applicants’ claims.

Independent claims 1 and 12, as amended, are patentable for additional reasons. Specifically, Applicants’ amended claims 1 and 12 each set forth “each of said second plurality of guides inclined at a second angle relative to said downward direction.” The side surfaces (301) are oriented in the plane of the downward direction in Figure 3. In contrast to claims 1 and 12 as amended, instead of being inclined relative to the downward direction, a person having ordinary skill in the art would comprehend that the side surfaces (301) in *Haynes* are oriented parallel to the downward direction and, therefore, do not deviate from the downward direction or otherwise slant relative to the downward direction. Claim 32 is similarly allowable (“said plurality of guides each inclined”).

Independent claim 32 is also patentable. Specifically, amended claim 32 recites guides each “including a surface having an increasing angle of inclination relative to said downward direction with increasing distance from the outlet.” (See Applicants’ FIGS. 10 and 11). In contrast, *Haynes* discloses only a constant slope to its teeth (303).

For at least these reasons, *Haynes* fails to teach each and every element in the precise arrangement set forth in independent claims 1 and 12 as amended, and claim 32. Therefore, Applicants respectfully request that the Examiner withdraw this rejection.

Because claims 2-7, 30, and 31 depend directly or indirectly from independent claim 1, and claims 13-19 depend directly or indirectly from independent claim 12, Applicants submit that these dependent claims are also patentable for at least the same reasons as the corresponding

independent claim. Furthermore, each of these dependent claims recites a unique combination of elements not disclosed or suggested by *Haynes*. Specifically noted are claims 6 and 17, which recite the first plurality of guides and second plurality of guides as being inclined symmetrically about a plane containing the downward direction so that the angle of the first plurality of guides from the downward direction is equal and opposite to the angle of the second plurality of guides from the downward direction. *Haynes* neither discloses nor suggests this element, and accordingly claims 6 and 17 are patentable over *Haynes*.

New Claims

New claims 33-37 recite features neither taught nor suggested by any of the documents of record. Therefore, these claims are submitted to be patentable and allowance thereof is respectfully solicited. Support for claims 33-37 may be found in FIGS. 1-4 and 7-11 and the accompanying portions of the specification, with specific reference to page 14, line 1 through page 15, line 1.


Conclusion

Applicants have made a bona fide effort to respond to each and every requirement set forth in the final Office Action. In view of the foregoing amendments and remarks, this application is submitted to be in complete condition for allowance and, accordingly, a timely notice of allowance to this effect is earnestly solicited. In the event that any issues remain outstanding, the Examiner is invited to contact the undersigned to expedite issuance of this application.

Respectfully submitted,

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